

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**SECOND SET OF INFORMATION REQUESTS OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
KEYSPAN ENERGY DELIVERY NEW ENGLAND, D.T.E. 05-54**

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to KeySpan Energy Delivery New England (“KeySpan” or “Company”) the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to KeySpan in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if KeySpan or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, microfilm, microfiche, audio recordings, video recordings, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals, electronic mail or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. The term “KeySpan” means KeySpan Energy Delivery New England, its agents, servants, or employees.
7. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
8. Please serve copies of the responses as follows: one (1) copy of the responses to Mary Cottrell, Secretary of the Department and on all parties; two (2) copies of the responses to Andrea Saia, Hearing Officer, on three-hole punch paper; and one (1) copy of the responses to Alexander Kofitse, Gas Division and to Kenneth DellOrto, Gas Division.

Requests

- DTE 2-1 The Company is requesting recovery of incentives associated with its new savings and cost-effectiveness performance metrics. However, on page 17 of Keyspan Energy Delivery New England, D.T.E. 03-86 (2004), the Department directed KeySpan to submit for Department review and approval the benchmarks and annual performance goals for the savings and cost-effectiveness performance measures before implementing the proposed changes.
- A) Why is the Company requesting recovery of these incentives prior to receiving Department approval of each metric’s benchmarks and goals?
- B) Does the Company believe that the status report filed with the Department within the Company’s August 1, 2005 Energy Efficiency Compliance Filing in D.T.E. 05-54 (“2005 Compliance Filing”) satisfies the Department’s directive in D.T.E. 03-86? If so, specifically explain how the status report satisfies the Department’s directive in D.T.E. 03-86. If not, why has the Company not filed for Department review and approval?
- DTE 2-2 Refer to Attachment 1a, page 1 of 3, in the 2005 Compliance Filing and explain how the Company calculated the reported therm savings. Also, provide all supporting calculations and documentation.
- DTE 2-3 Refer to Attachment DTE 1-4(2), page 1 of 6 in the Residential and Commercial Programs Budget Metric section of the Company’s Responses to the Department’s First Set of Information Requests, and provide all calculations, worksheets and supporting schedules that support the proposed threshold, target and exemplary performance levels. Also, include annual historical data comparing budgeted vs. actual spending by overall budget, sector budgets and program budgets.